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December 3, 2002

RECEIVED

DEC - 3 2002

**VIA HAND DELIVER**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

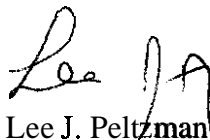
Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Portals II - 12<sup>th</sup> Street Lobby  
Filing Counter - TW-A325  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: MB Docket No. 02-290  
RM-10527  
Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations (Manila, Utah)  
Reply Comments**

Dear Ms. Dortch:

Transmitted herewith, on behalf of 3 Point Media-Utah, LLC is an original and four (4) copies of its Reply Comments in the above-referenced rulemaking proceeding. Please contact the undersigned should any questions arise regarding this matter.

Sincerely,



Lee J. Peltzman

Counsel for 3 POINT MEDIA-UTAH, LLC

LJP/kdm

Enclosures

No. of Copies rec'd 015F  
List ABCDE

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b)	)	
Table of Allotments	)	MB Docket No. 02-290
FM Broadcast Stations	)	RM-10527
(Manila, Utah)	)	
	)	

To: Assistant Chief, Audio Division  
Media Bureau

**REPLY COMMENTS**

3 Point Media-Utah, LLC ("3 Point"), licensee of Station KBNZ(FM), Tremonton, Utah, by its counsel, hereby submits its Reply Comments in the above-captioned proceeding. In support of its position, 3 Point states the following:

In its Counterproposal, filed November 18, 2002, 3 Point requested that the Commission amend its FM Table of Allotments to delete Channel 285C at Tremonton, Utah, and allot Channel 284C at Lyman, Wyoming as that community's first local service. To effectuate this change in community of license, 3 Point requested further changes. No other Counterproposal was filed. Petitioner, Rural Pima Broadcasting, filed Comments in support of its proposed first service to Manila, Utah, however, as noted below, 3 Point has found **an** alternate channel for Manila.

3 Point files the instant Reply Comments in order to clarify and correct certain statements made in its Counterproposal. 3 Point at paragraph 4 of its Counterproposal offered an alternate channel (Channel 228A) for the Manila, Utah proposal but did not provide an Engineering Statement in support of that proposed substitution. Such an Engineering Statement was provided

as part of another Counterproposal filed in this proceeding by sister entity, 3 Point Media-Franklin, LLC and is attached hereto.

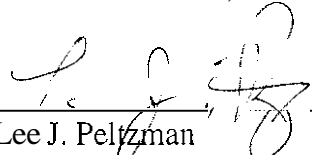
Additionally, 3 Point noted at paragraph 7 that the community at Tremonton would not be deprived of local service since Station KACE(AM) will remain licensed to Tremonton. Station KACE(AM) is authorized to serve Tremonton, but is presently a construction permit and is, therefore, not a licensed facility.

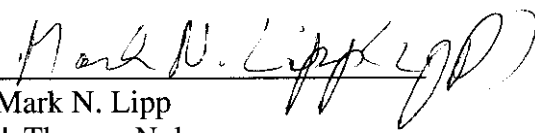
Finally, at paragraph 15, 3 Point incorrectly states that “the Joint Parties” request that the Commission issue an Order to Show Cause. There are no “Joint Parties” with respect to the subject Counterproposal and 3 Point notes that it, rather than any Joint Parties, requests the Commission to issue an Order to Show Cause regarding KSIT.

For the reason stated herein and in its earlier filed Counterproposal, 3 Point urges the FCC to promptly adopt a Report and Order implementing the 3 Point Counterproposal.

Respectfully submitted,

3 POINT MEDIA-UTAH, LLC

By:   
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By:   
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(202) 783-8400

Its counsel

December 3, 2002

# Engineering Statement

## In Support of a

## Counterproposal

MM Docket 02-290

### Channel 228A at Manila, Utah Allocation Study

(Using Proposed Channel 249A Coordinates as Reference)

REFERENCE				CLASS = A		DISPLAY DATES	
40 59 17 N						DATA	10-29-02
109 43 19 W				Current	Spacings	SEARCH	11-08-02
----- Channel 228 - 93.5 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
KUBLFM LIC 227C		Salt Lake City	UT	212.32	260.9	165.0	47.32
KUBLF'M CP 227C		Salt Lake City	UT	212.33	260.9	165.0	41.33


CERTIFICATE OF SERVICE

I, Karen McNeill, a secretary in the law firm of Shainis & Peltzman, Chartered, do hereby certify that I have on this 3<sup>rd</sup> day of December, 2002 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Counterproposal" to the following:

Sharon P. McDonald\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 3-A226  
Washington, D.C. 20554

Rural Pima Broadcasting  
c/o Scott C. Cinnamon, Esq.  
1090 Vermont Avenue, N.W.  
Suite 800  
Washington, D.C. 20005  
(Petitioner for Manila, Utah)

Big Ticket Broadcasting of Wyoming  
2727 Yellowstone Road  
Rock Springs, Wyoming 82901  
(Licensee of KSIT, Rock Springs, Wyoming)

  
\_\_\_\_\_  
Karen McNeill

\*Via Hand Delivery